

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

STATE OF NEBRASKA,)	CASE NO. 4:22CR3018
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S MOTION FOR
)	EXTENSION OF TIME
Christopher Groth,)	
)	
Defendant.)	

COMES NOW the Defendant, Christopher Groth, by and through his attorney of record, and hereby respectfully requests that the time for filing his objections to the Presentence Report and/or any Motions for Downward Departure/Variance, be extended until July 20, 2023. In support of this motion, the undersigned states that:

1. Defense counsel needed additional time to review the Presentence Report;
2. Defense counsel has had a busy trial schedule and other pending matters, which has caused a delay in the filing of Motion for Departure/Variance.

WHEREFORE, Defendant respectfully requests that this Court issue an Order extending the deadline for the objections to the Presentence Report and Motions for Downward Departure/Variance until July 20, 2023.

Respectfully submitted this 19th day of July, 2023.

Christopher Groth, Defendant

By: /s/ Carlos A. Monzón
Carlos A. Monzón, #20453
Attorney for Defendant
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this ____ day of July, 2023, the foregoing Motion for Extension of Time was electronically filed with the Clerk of the Court using the ECM/ECF system, which sent notification of said filing to the following:

Tessie L. Smith
Assistant U.S. Attorney
100 Centennial Mall North
Suite 487
Lincoln NE 68508

/s/ Carlos A. Monzón
Carlos A. Monzón, #20453